



# **Special Education Reform Task Force**

## Final Report to the Governor

### January 2016

Listening

Learning

Leading

 LtGov



STATE OF MICHIGAN  
EXECUTIVE OFFICE  
LANSING

RICK SNYDER  
GOVERNOR

BRIAN CALLEY  
LT. GOVERNOR

January 2016

Governor Snyder,

On October 16, 2015, you created the Special Education Reform Task Force to recommend reforms through the development of policy recommendations that will help ensure all Michigan children have an opportunity to reach their full potential. In accordance with this request, the Task Force has developed this strategic roadmap to address the key findings of a statewide listening tour and survey I conducted through much of 2015.

From October through December, the Task Force met weekly as a full group while smaller workgroups held discussions on several focus areas. The full Task Force also heard presentations from education experts on behavioral support initiatives. Members put in many hours of work behind the scenes, staying in touch by phone and email throughout the process to ensure the report could be completed within the established timeline. The members of the Task Force deserve kudos for their commitment to the work and their dedication to the families and educators we all are looking to serve better through this effort.

What became clear from the earliest work of the Task Force is that the state's responsibility for educating children needs to be refocused. Our services should mold to the specific needs of each child, instead of expecting children to conform to an established system. The efforts we discussed as a Task Force regarding children eligible for special education could, in many ways, apply to all children in the state. By addressing the needs of students who all are capable of learning but some of whom may need more intensive support, the state can be a national leader in ensuring that all children, regardless of disability, can live the most independent, productive and successful lives as adults.

The following five subject areas represent the key findings from the Special Education Listening Tour and online survey. They represent the areas most often cited as needing improvement from the perspective of those relying on special education services in Michigan.

- 1) Develop a more inclusive and transparent rulemaking process**
- 2) Improve access to, and the scope and quality of, services**
- 3) End the practices of restraint and seclusion**
- 4) Create a better problem-solving process (initially referred to as "dispute resolution")**
- 5) Support parents, guardians and educators more with resources and options**

The expertise of the members of the Task Force provided a well-rounded and informed perspective from which to approach these complex and important needs. Since inception of the Task Force, the participants have worked diligently to construct and offer the recommendations found in this report. All people deserve a chance to lead self-determined and independent lives. An effective education is essential in achieving that outcome. We look forward to working in partnership with parents and guardians, educators, communities, the state Legislature, the state Board of Education, the state School Superintendent, the Michigan Department of Education and others to implement these recommendations.

Sincerely,

A handwritten signature in black ink that reads "Brian Calley". The signature is written in a cursive, flowing style.

Lt. Gov. Brian Calley

Chairman

Michigan Special Education Reform Task Force

**Final Report and Recommendations**  
**Michigan Special Education Reform Task Force**

**January 2016**

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## II. Issue Areas With Recommendations

### Develop a more inclusive and transparent rulemaking process

A 2014 proposal to change rules governing special education in Michigan revealed a need to enhance opportunities for more citizens to become aware of and provide meaningful feedback about proposed rule changes. That rule change proposal was the catalyst of several events, culminating in the creation of this report.

The recommendations in this section seek to address multiple aspects of the existing rulemaking process, considering both access and opportunity issues. Understandably, most citizens would not understand how, when or where an interested party may provide timely input before changes are made to the rules governing the special education system in Michigan. Adoption of the following practices would create a more inclusive and transparent process.

#### **Task Force Recommendations:**

1. The state Board of Education and the Michigan Department of Education Office of Special Education currently implement standards of the Administrative Procedures Act as the minimum when promulgating new or revised rules. The Board should provide guidance on how the Department and the Office of Special Education could facilitate additional activities found in this report's recommendations.
2. When determining the need for a new or revised rule, the Michigan Department of Education Office of Special Education should:
  - a. Consult with the [Special Education Advisory Committee](#), a federally mandated state advisory panel to the state Board of Education and the Michigan Department of Education.
  - b. Publish a written statement prepared by the Michigan Department of Education if the Department is proposing the change or by those seeking the rule revisions, indicating who is making the request and what the specific intent or intended outcome is. This statement should be written in common language that avoids jargon, legalese and acronyms.
  - c. Provide and promote formal opportunities for discussion, input and feedback from parents and guardians, students, educators and stakeholder groups.
3. The state Board of Education and the Michigan Department of Education should implement a system that provides a clear and unbiased rule revision analysis. This analysis is intended to compare the proposed rule revision to the original intent communicated in the request stage. It should include a statement of impact of the proposed rule on students receiving special education services as well as to school districts.

4. To facilitate the opportunity for a more comprehensive collection of public input and public comments on proposed rule revisions, the Task Force recommends the Michigan Department of Education undertake the following actions:
  - a. Increase the number of public hearings conducted, with an emphasis on providing ample locations and times for public participation across the entire state.
  - b. Extend the length of the public hearing comment period to a minimum of 8 weeks.
  - c. Provide access to public hearings via live Internet streaming.
  - d. Increase the number and type of public awareness activities provided to notify the public about proposed rules, rule changes and related public hearings and public input opportunities, including direct communication with families and engagement with local parent advisory committees.
  - e. Using existing federal and state laws as the minimum standard, ensure that public input is accessible to all.

### **Increase access to, and improve the scope and quality of, services**

Addressing the cause of problematic behaviors by students rather than simply taking disciplinary action is an opportunity for visionary change for Michigan's students. In addition, research shows that addressing behavior with a positive support system as a cornerstone for improving academic performance is a change that can serve all students well.

While the Task Force has laid out a comprehensive set of proposals to address each of the five Key Findings of the Listening Tour, we firmly believe that the other areas of concern would be positively and substantially impacted if the recommendations in this section were adopted and implemented effectively and with fidelity.

The State of Michigan needs to take proactive steps toward providing the best educational program designed to meet each child's unique needs, while working to end the silos of "special education" and "general education." All students can learn and deserve access to curriculum, but may need different levels of support to reach their potential. As the needs of a student increase, the intensity of services for that student should increase.

Preparing students for competitive employment in integrated settings is important for success and independence in adulthood. However, our nation's special education system was designed with a focus on compliance rather than improving student performance. Instead, we should be looking at outcomes and a person's continuum of educational experiences, in addition to how schools can best support them throughout their academic journey.

The Task Force believes schools should be implementing evidence-based instructional practices. In addition, when students demonstrate a lack of progress, the education system should be able to provide additional

support to ensure student success. An evidence-based, tiered approach allows schools to address the unique learning styles of all students.

The evidence-based Multi-Tiered System of Supports can provide a framework that gives students the best opportunities to succeed academically, socially and behaviorally in school. The Multi-Tiered System of Supports provides for early prevention and intervention, facilitating educational success for all students.

The Task Force believes that the use of Positive Behavioral Interventions and Supports as part of a Multi-Tiered System of Supports is needed and that implementation with a high degree of fidelity would free up valuable staff time, provide for a safer environment for students and educators, and result in stronger academic performance for the majority of students in a school.

Positive Behavioral Interventions and Supports is defined nationally as a framework or approach for assisting school personnel in adopting and organizing evidence-based behavioral interventions into an integrated continuum that enhances academic and social behavior outcomes for all students ([PBIS.org](http://PBIS.org)). Bradley (2009) describes Positive Behavioral Interventions and Supports as an applied science of human behavior that unites the precision of a careful, analytical examination of the function of problem behavior, a broader framework of person-centered values and processes, and an emphasis on teaching alternative skill repertoires.

Again, note that implementation with fidelity of these support systems improves the chance of success for all students.

Equity in the quality of services must be a priority for Michigan's students. Meeting the needs of all students is critical to ensuring they can lead self-determined, more independent lives with the vast majority being college, trade school or career ready upon completion of their education. The Task Force believes that students with disabilities can benefit from access to the general education curriculum and connections to their peers.

The Task Force also acknowledges that students require varying types and intensities of supports in order to achieve their full potential, which for students with disabilities includes the availability of a continuum of instruction that may include regular classes, special classes, special schools and home instruction. In determining appropriate intervention, the particular needs of each student should be paramount versus predetermined services based on a diagnosis.

The Multi-Tiered System of Supports involves a combination of components that facilitates higher academic and social achievement (McIntosh & Goodman, 2015). This would include targeted small-group interventions that focus on academic skill building, vocational training and activities of daily living. Intensive interventions are individually developed for students with significant challenges and these interventions are linked to results from careful assessment of the student's needs. Through each tier of support, interventions are matched to student needs. Progress is monitored frequently to make decisions about changes in instruction or goals, and data is used to allocate resources to improve student learning.

Successful learning environments must address academic instruction and behavior hand-in-hand. In some communities, the focus on strict discipline as a tool for behavior modification is being replaced with a new understanding that behavior can be taught in an integrated process with academic instruction. A healthy school climate developed through Positive Behavioral Interventions and Supports contributes to schools experiencing an increase in instructional time, improved academic performance, a reduction in rates of suspension and expulsion, and a reduced use of restraint and seclusion. As students learn, demonstrate understanding and are acknowledged for appropriate behavior, the school's learning environment improves for everyone.



The overuse of suspension and expulsion for behavior that is not a threat to the learning environment is still widely supported through local board policy and student codes of conduct. The Task Force believes these policies and codes of conduct should instead focus on evidence-based mechanisms for improving behavior.

Certain positive behavioral supports involve the whole school, such as consistent rules, consequences, and reinforcement of appropriate behavior for all students. The tiers then narrow upward, with more intensive support for groups of students exhibiting at-risk behavior and individualized services for students who continue to exhibit troubling patterns of behavior.

Positive Behavioral Interventions and Supports is becoming more widely adopted and supported within schools because of proven effectiveness. Research from multiple universities shows that schools using Positive Behavioral Interventions and Supports enjoy reduced disruptive behavior, reduced bullying, increased academic achievement, increased school safety, improved teacher climate, increased social competence, and increased emotional regulation (Bradshaw, Koth, Thornton, & Leaf, 2009; Bradshaw, Waasdorp, & Leaf, 2012; Horner et al., 2009; Kelm & McIntosh, 2012; Nelson, Martella, & Marchand-Martella, 2002; Waasdorp, Bradshaw, & Leaf, 2012).

Educators and the general public have rated behavior-related issues in the top three concerns facing public schools over the past 35 years (Rose & Gallup, 2007). As one way to address this, implementation of schoolwide positive behavior support leads to increased academic time and enhanced academic outcomes (Algozzine & Algozzine, 2007; Horner et al., 2009; Lassen, Steele, & Sailor, 2006). Although students with severe behavior problems account for a relatively small portion of the school population (1% to 5%), they often generate greater than 50% of office and discipline referrals, taking up a significant amount of educator and administrator time (Sugai et al., 2000).

Research amplifies the need to address these issues proactively and through early intervention, finding that by late elementary school, behavioral difficulties are often chronic and associated with negative educational, occupational, and societal outcomes (Walker, Colvin, & Ramsey, 1995). Moreover, when efforts toward intervention are provided in a crisis or reactive manner, behavior problems can become more pronounced and potentially more resistant to change (Forness, 2003a, b). With early intervention, outcomes for students with behavioral challenges are much more promising and negative outcomes can often be curtailed (Forness, 2003a, b; Walker et al., 1995).

Across Michigan and around the country, Positive Behavioral Interventions and Supports -- and more broadly, a Multi-Tiered System of Supports -- have resulted in successful student outcomes. This effort has been researched and supported through the [Michigan Integrated Behavior and Learning Support Initiative](#), a nationally recognized Michigan Department of Education program. This program provides a statewide structure to specifically support local initiatives for an integrated behavior and reading program.

Lessons learned from increasing the size and scope of the Michigan Integrated Behavior and Learning Support Initiative in more than 500 schools over 12 years suggests that to effectively produce positive student outcomes, implementation must take place with fidelity at the school level while the intermediate school district remains responsible for supporting those schools and the state remains responsible for coordination of efforts (Ervin, R.A., Schaughency, E., Goodman, S.D., McGlinchey, M.T., & Matthews, A., 2007; Nantais, M., St. Martin, K. & Barnes, A., 2015; Russell, C., & Harms, A., 2016).

### **Task Force Recommendations:**

1. The Michigan Department of Education, working through the Michigan Integrated Behavior and Learning Support Initiative, should create a strategic plan for statewide implementation of a Multi-Tiered System of Supports.
  - a. This overall plan should include a strategic plan for expanding the use of Positive Behavioral Interventions and Supports in all Michigan schools to help all Michigan students.
2. The Michigan Department of Education, working through the Michigan Integrated Behavior and Learning Support Initiative, should partner with intermediate school districts to develop initiatives for the professional development of educators in regard to a Multi-Tiered System of Supports and Positive Behavioral Interventions and Supports.
3. The Michigan Department of Education, working through the Michigan Integrated Behavior and Learning Support Initiative, should partner with intermediate school districts to offer local school districts technical assistance for the implementation of evidence-based behavioral initiatives with fidelity and sustainability.

### **End restraint and seclusion in schools**

In too many cases, from what parents and guardians reported during the Listening Tour and through the online survey, restraint and seclusion are still being used for behavior modification and control. Such use is ineffective and dangerous for students and school personnel.

In December 2006, the state Board of Education adopted standards on the emergency use of restraint and seclusion of students. These guidelines, outlined in the document “Supporting Student Behavior: Standards for the Emergency Use of Seclusion and Restraint,” are merely suggestions and do not carry the force of law.

Using the Board of Education’s standards as a starting point, legislation is being crafted to ban the use of restraint and seclusion in schools, except in certain specified emergency situations. Even then, such use would be allowed only if certain procedures are followed and specified protections are in place.

Even after enactment of this law, the Michigan Department of Education should closely monitor emergency use of restraint and seclusion in schools to ensure universal compliance.

It should be noted that the Task Force believes the successful implementation of the recommendations in the second section of this report related to Positive Behavioral Interventions and Supports as well as a Multi-Tiered System of Supports would significantly reduce the circumstances under which restraint and seclusion would be necessary.

### **Task Force Recommendations:**

1. The Legislature should pass and the Governor should sign legislation restricting the use of restraint and seclusion in Michigan schools to specified emergency situations provided certain procedures are followed and specified protections are in place, including:
  - a. School personnel who may be involved in emergency restraint or seclusion are trained on how to safely implement such practices pursuant to the new law.
  - b. Each use of restraint or seclusion is documented and reported to parents/guardians and the Michigan Department of Education.
  - c. Data on restraint and seclusion is collected and analyzed to, among other things, determine the effectiveness of the school-wide adoption of Positive Behavioral Interventions and Supports in significantly reducing and ultimately eliminating the need for the use of restraint and seclusion.

### **Create a better problem-solving process\***

Per federal law, each public school child who receives special education and related services must have an Individualized Education Program to meet their unique educational needs that is developed by a team of teachers, parents, school administrators, related services personnel, and the students (when appropriate). This team must work together to improve educational results for children with disabilities.

Disputes over Individualized Education Programs may result in adversarial and expensive, drawn-out legal confrontations between families and school districts. When a parent believes their child is not receiving the public education they are entitled to, in the least restrictive environment, there should be better, more affordable options.

Since the adoption of the Education for All Handicapped Children Act in 1975, the U.S. Congress anticipated that there may be disagreements over special education activities. Over the years since, Congress has crafted a series of problem-solving options now embodied within the current federal Individuals with Disabilities Education Act. These problem-solving options include:

- Discussion between the parties, which may occur within an Individualized Education Program team meeting as circumstances arise, and can include an Individualized Education Program facilitator.
- Mediation, which may occur at any time and may or may not be in the context of a due process hearing.
- Filing of a formal special education written complaint with the state.

Mediation over disputes is available today in Michigan. Unfortunately, many educators, parents and guardians do not know of its existence or are intimidated when lawyers participate in mediation. Additionally, some individuals and some school districts decline to participate in mediation. Even when mediation is initiated, the

high demands and complexity of federal and state law surrounding special education requires a substantial level of specialized knowledge on the part of the mediator if they are to be successful in resolving disputes.

All children have great potential to positively impact the world and our focus should be on how to unlock that potential. To be successful, children need multiple, coordinated wraparound services. If they are to succeed in our public education system, all children need a cohesive and cooperative effort between parents and guardians, educators, support staff, service providers and community agency partners.

The state can better support families in accessing and understanding information regarding the problem-solving process. It also can help facilitate resolutions that result in less legal expense for families and school districts as well as a renewed focus on the educational well-being of the child.

*\*During Lt. Gov. Calley's statewide tour, there was a focus on "dispute resolution," which was reflected in his report to the state Board of Education. The Task Force determined that "dispute resolution" was too limiting and the recommendations should encompass many areas of problem solving.*

#### **Task Force Recommendations:**

##### Proactive Problem-Solving

1. The Michigan Department of Education should annually convene a roundtable of disability advocacy groups as well as intermediate and local school district special education administrators to review the use of mediation services and final reports of complaints filed with the state to determine if systemic trends are developing that need to be addressed.
2. The Michigan Department of Education should contract with a trained unit of four or five federal Individuals with Disabilities Education Act grant-funded mediators who are knowledgeable about state and federal special education laws, rules, policies, procedures and U.S. Office of Special Education Programs non-regulatory guidance documents.
  - a. These mediators should be available statewide for dispute resolution.
  - b. The mediators should sign annual conflict of interest contracts.
  - c. The mediators should complete 16 hours of professional learning opportunities annually pertaining to effective mediation techniques as well as state and federal special education rules and laws.
    - i. The training should be overseen by the Dispute Resolution Centers funded under the federal Individuals with Disabilities Education Act as well as the Michigan Special Education Mediation Program.

### Resolution Session/Mediation

3. Mediation should be seriously considered if one party makes the request and the Michigan Department of Education should issue guidance to school districts to dissuade them from using attorneys during mediation unless the parent/guardian is represented by legal counsel.
  - a. School districts should respond to all requests for mediation made by parents and guardians within 5 school days, notifying the requestor of whether the district intends to participate in mediation or not.
  - b. The Michigan Department of Education should provide information on its website regarding the federal Individuals with Disabilities Education Act grant-funded advocacy services that are available to assist parents/guardians free of charge with mediation services and an Individualized Education Program facilitator.
4. The Michigan Department of Education should review data annually regarding the use of mediation services and facilitated Individualized Education Program Team meetings, and then use that data to determine the need for increased promotion of free mediation programs and services to parents/guardians.
5. The Michigan Department of Education should continue surveying parents/guardians and school districts at the conclusion of each mediation session.
  - a. The Department should review the survey results to determine whether the mediator is seen as impartial by all parties involved.
  - b. The internal evaluation by the Department should be ongoing and external evaluations should be conducted routinely, as was done by Wayne State University in 2011.
6. The state Legislature should review the practice of intermediate school districts reimbursing local school districts for legal fees resulting from mediation and dispute resolution meetings.

### State Complaints

7. The Michigan Department of Education should reinstate a 10-day appeal for the special education written complaint process. This would occur outside the 60-day timeframe of the standard complaint investigation defined in the federal Individuals with Disabilities Education Act. The decision of the appeal should be considered final.
8. The Michigan Department of Education and intermediate school districts should promote the state's written complaint process as a neutral, non-litigious step in an effective problem-solving process.

- a. Individuals wishing to file a complaint must do so by following the established processes, which means complaints cannot be filed anonymously. School district staff should be reminded of legal safeguards that exist to protect them while exercising their right to report suspected noncompliance.
  - b. The Michigan Department of Education should continue to make the Office of Special Education Information Help Desk staff available for assistance with filing a complaint with the state.
9. The Michigan Department of Education Office of Special Education should contract with an outside consultant to provide recommendations for effective implementation of the existing problem-solving process.

#### Informational/Technical Assistance

10. The Michigan Department of Education should provide clarification to school districts regarding the allowable use of funds as it relates to the use of attorneys in special education disputes. The use of attorneys should be limited to the support of districts and parents/guardians in accordance with the federal Individuals with Disabilities Education Act.
11. The Michigan Department of Education should provide guidance suggesting to school districts that a parent's written request for a team meeting on an existing Individual Education Program should be responded to within 10 school days.
- a. The guidance also should suggest that if a decision is made to hold an Individual Education Program team meeting, it should be held within 30 school days of the decision.

The Task Force believes the successful implementation of the recommendations in the section of this report titled "Increase access to, and improve the scope and quality of, services" could reduce the circumstances in which mediation and dispute resolution processes would be necessary.

#### **Support parents, guardians and educators with more resources and options**

Many families have described being overwhelmed and confused when confronted with the Individualized Education Program process, which is supposed to be collaborative and focused on helping children. Ensuring that parents and guardians are well informed will allow them to provide more meaningful and impactful input.

We expect more from our teachers than ever, especially when "least restrictive environment" requirements are embraced. State and federal laws governing education of students eligible for special education programs are complex, and many teachers need more support, resources, instructional materials, professional development and guidance in meeting those requirements.

A system should be established to ensure that parents and guardians receive the information they need to understand their rights, responsibilities and procedural safeguards related to an Individualized Education Program and to feel comfortable discussing their child's education with educators and administrators. In addition, teachers need to be encouraged to speak up about a child's well-being, educational achievement, need for related services or individualized support within a school.

#### **Task Force Recommendations:**

##### Information Dissemination

1. The Michigan Department of Education and all school districts should work to ensure that parents and guardians are fully informed of their procedural safeguards and problem-solving options.
2. The Michigan Department of Education should promote the Office of Special Education Information Help Desk, as well as Michigan's federally funded Parent Training and Information Center, Michigan Alliance for Families and the Michigan Special Education Mediation Programs. This will help ensure that parents and guardians, educators and administrators have contact information and Internet resources readily available to them.
  - a. The information promoted should specifically pertain to special education rules and laws, procedural safeguards, workshops, free advocacy and mediation services to assist families in enhancing their ability to provide meaningful input regarding their child's educational planning.
  - b. The Michigan Department of Education should develop and execute a strategic plan to promote services available to families. This promotion should pertain to online and printed resources for families to obtain free information about special education topics, as outlined in state and federal law.
3. The Michigan Department of Education should develop and execute a strategic plan to communicate services available to families with a student with a disability. This promotion should include online and printed resources for families to obtain free information about special education topics, as outlined in state and federal law. Local and intermediate school districts should use this information to proactively contact the families of students regarding procedural safeguards and the resources available to them.
4. School districts have a responsibility to ensure eligible children have a surrogate parent available within 30 days of identifying the child has need for representation. Therefore, intermediate school districts should maintain a list of qualified, trained surrogate parents and guardians as identified in the Michigan Administrative Rules for Special Education.

### Educating Educators

5. Universities and colleges in Michigan granting teaching certificates should review their curriculum to ensure that all educators receive instruction on effective evidence-based practices related to teaching students eligible for special education.
6. The Michigan Department of Education should review the current training opportunities for teachers across the state and provide guidance to intermediate and local school districts on training all educators in the evidenced-based practices related to teaching students with disabilities.

### Parent/Guardian Participation

7. School districts should use common language that avoids jargon, legalese and acronyms in all written and verbal communication regarding Individualized Education Program meetings and refrain from using jargon, legalese and acronyms during those meetings.
8. Intermediate school district parent advisory committees should promote their meeting schedules and seek the ongoing input of parents and guardians of students with a disability regarding available programs and services.
9. The Michigan Department of Education, in partnership with intermediate and local school districts, should encourage the creation of parent-led organizations comprised of families with students with a disability.
10. Local and intermediate school districts should partner annually with the intermediate school district's parent advisory committee to offer workshops that would help disseminate information and answer questions from parents and guardians of students with a disability.
11. Local and intermediate school districts should continue to include parents and guardians of students with a disability on district and building school improvement teams as part of the district's overall improvement planning process.



### **III. Continuing the Work of the Task Force**

1. An education workgroup appointed by the Governor should monitor and assist in the implementation of this Task Force's recommendations, particularly but not limited to the implementation of a Multi-Tiered System of Supports and Positive Behavioral Interventions and Supports practices for all students in all schools statewide.
2. The education workgroup appointed by the Governor also should:
  - a. Continue to monitor the education system in Michigan to ensure the needs of all students are being met.
  - b. Routinely review whether the needs of parents/guardians and educators involved with special education are being met.
  - c. Provide to the Governor, the state Legislature, the state Board of Education and the Michigan Department of Education possible initiatives to increase access to and improve the scope and quality of special education services available.
  - d. Be comprised of individuals representing parents and guardians, educators, advocates, academia, state government officials and elected officials involved with special education teaching or policy. (This group should include the Governor's Education Advisor and the State School Superintendent or designee.)

### **IV. Conclusion and Acknowledgments**

The members of the Michigan Special Education Reform Task Force pledge to continue our efforts in working with the Governor, the state Legislature, the state Board of Education, the Michigan Department of Education, educators, parents and guardians across Michigan who work to support all children to become independent, well-educated, contributing members of society who are leading self-determined lives.

The Task Force wishes to acknowledge the resources and countless hours of work provided to it by staff in the Office of the Governor and the Michigan Department of Education, as well as the invaluable submissions of information and feedback provided by various individuals. This report could not have been completed as effectively or efficiently without their assistance and input.